

1 T. LOUIS PALAZZO, ESQUIRE
2 Nevada Bar No. 4128
3 PALAZZO LAW FIRM
4 A PROFESSIONAL LAW CORPORATION
5 520 South Fourth Street, Second Floor
6 Las Vegas, Nevada 89101
7 Telephone: (702) 385-3850
8 Fax: (702) 385-3856

9 NATHAN F. GARRETT
10 *pro hac vice*
11 LUCINDA H. LUETKEMEYER
12 *pro hac vice*
13 GRAVES GARRETT GREIM LLC
14 1100 Main Street, Suite 2700
15 Kansas City, Missouri 64105
16 Telephone: (816) 256-3181
17 Fax: (816) 256-5958

18 *Attorneys for Defendant*
19 *Michael Halprin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 UNITED STATES OF AMERICA,
23
24 Plaintiff,

25 vs.

26 MICHAEL HALPRIN,
27
28 Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR JANUARY
14, 2025**

IT IS HEREBY STIPULATED AND AGREED by and between JASON FRIERSON,
United States Attorney, District of Nevada, and NADIA AHMED and JACOB OPERSKALSKI,
Assistant United States Attorneys, representing the United States of America, and LOUIS
PALAZZO, NATHAN GARRETT, and LUCINDA LUETKEMEYER, representing Defendant
Michael Halprin, that the sentencing hearing scheduled for January 14, 2025, at 9:15 a.m., in the

1 above-captioned matter, be vacated and continued to a date and time to be set by this Honorable
2 Court but no sooner than February 17, 2025.

3 This stipulation is entered into for the following reasons:

4 1. Sentencing in this matter is currently scheduled for January 14, 2025, at 9:15 a.m.

5 2. A Status Conference in this matter was held on September 10, 2024. During this
6 conference, the Court granted a Motion to Withdraw as Counsel filed by counsel for co-
7 defendant Eghomware Igbinovia, aka Jerry Igbinovia, (“Igbinovia”) and instructed CJA to
8 appoint new attorneys for Igbinovia.
9

10 3. On September 13, 2024, Federal Public Defender Heidi A. Ojeda was appointed as new
11 counsel for Igbinovia.
12

13 4. On September 16, 2024, Assistant Federal Public Defender Nisha Brooks-Whittington
14 entered her appearance as counsel for Igbinovia.

15 5. Counsel for Igbinovia and the government jointly moved to continue the calendar call
16 and trial date. Trial is now scheduled for January 13, 2025. Dkt. No. 416.
17

18 6. Defense counsel needs additional time to investigate issues relevant to sentencing and
19 prepare for sentencing.

20 7. Mr. Halprin has appeared in this case, and is not in custody and, along with the
21 government, agrees to this continuance.
22

23 8. The additional time requested herein is not sought for purposes of delay and the denial of
24 this request for a continuance could result in a miscarriage of justice.

25 9. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing
26 hearing for good cause. Good cause exists in this case.
27
28

1 10. Counsel for Defendant Michael Halprin and the government agree a continuance of the
2 sentencing hearing is in the best interests of justice.

3 11. For all the above-stated reasons, the ends of justice would be best served by the
4 continuance of the sentencing hearing.

5 This is the ninth request for a continuance of the sentencing hearing.
6
7
8

9 DATED: November 20, 2024
10

11 /s/ Nathan F. Garrett

GRAVES GARRETT GREIM LLC

Nathan F. Garrett, *pro hac vice*

Lucinda H. Luetkemeyer, *pro hac vice*
13

PALAZZO LAW FIRM

A PROFESSIONAL LAW CORPORATION

T. Louis Palazzo, Esquire

Counsel for Defendant Michael Halprin
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18 JASON FRIERSON

United States Attorney

By /s/ Jacob Operskalski

Jacob Operskalski

Assistant United States Attorney
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL HALPRIN,

Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR JANUARY
14, 2025**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Sentencing in this matter is currently scheduled for January 14, 2025, at 9:15 a.m.
2. Defense counsel needs additional time to investigate issues relevant to sentencing and prepare for sentencing.
3. Mr. Halprin has appeared in this case, and is not in custody and, along with the government, agrees to this continuance.
4. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.
5. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing hearing for good cause. Good cause exists in this case.

For all of the above-stated reasons, the ends of justice would best be served by an order vacating the current sentencing hearing date and continuing the sentencing hearing date no sooner than February 17, 2025.

ORDER

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for January 14, 2025, at the hour of 9:15 a.m., be vacated and continued to **March 10, 2025 at 9:15 a.m.**

Dated this the 21st day of November, 2024.

A handwritten signature in black ink, appearing to be 'R. Boulware', written in a cursive style.

THE HONORABLE RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE
